

Exhibit 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 IN RE: FCA US LLC MONOSTABLE
5 ELECTRONIC GEARSHIFT LITIGATION

6 Case No. 16-md-02744

7 MDI No. 2744,

8
9 The Deposition of STEPHEN WILLIAMS, taken at The
10 Miller Law Firm, P.C., 950 West University Drive,
11 Suite 300, Rochester, Michigan, commencing 10:20 a.m.
12 on Wednesday, November 28th, 2018, before Susan
13 Capobianco, CSR-2282.

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23 VERITEXT LEGAL SOLUTIONS
24 MID-ATLANTIC REGION
25 1801 Market Street - Suite 1800
 Philadelphia, PA 19103

1 A. From my experience, yes. I mean that's going to
2 happen with all vehicles because there is mandated
3 standards astringent to it. You have to have a fuel
4 economy that increase every year. So all vehicles
5 are subject to it.

6 Q. His answer continues two lines down. The shifter
7 featured in the subject vehicles is the exact same
8 components used by at least two other vehicle
9 manufacturers; do you see that?

10 A. Yes.

Class Cert Designations

11 Q. That again is referring to the monostable shifter as
12 being the exact same component that was used in the
13 Audi and the Bentley?

14 A. Correct.

15 Q. Obviously if the exact same component as used in the
16 Audi and Bentley, it's the exact same component
17 through the class vehicles, correct?

18 A. Yes, for the most part, yes.

19 Q. Except for the stalks are a little taller?

20 A. The stalks are a little taller and some of the
21 bezels may be different. And again there is
22 probably some minor differences in some of the
23 module functionality, that's why we had so many
24 recall remedies that were slightly different.

25 Q. No material differences though?

Class Cert Designations

1 A. No.

2 Q. The answer continues that 87 percent of all reports
3 provided the investigation did not result in crash
4 injury or property damage; that was an accurate
5 figure?

6 A. Yes.

7 Q. Some 13 percent of all the reports did involve crash
8 injury or property damage, correct?

9 A. Correct.

10 Q. We continue with the answer, these reports do not
11 describe malfunctions of the shifter. These reports
12 express difficulty achieving the desired gear
13 without having to view the display and other
14 indicators for confirmation of the desired gear has
15 been achieved, but do not suggest unintended roll
16 away is a risk for the large majority of operators;
17 do you see that?

18 A. Yes.

19 Q. And you agree with what's written there, that I just
20 read?

21 A. Yes, I do.

22 Q. Are you aware of studies having been conducted,
23 before the vehicles were manufactured where
24 participants said, one thing they did not want to
25 have in the shifter was to have to look somewhere to

1 STATE OF MICHIGAN

2 COUNTY OF OAKLAND

3 I, Susan Capobianco, a Notary Public in and
4 for the County of Oakland, State of Michigan, do hereby
5 certify that the witness whose attached deposition was
6 taken before me in the above-entitled matter was by me
7 duly sworn at the aforementioned time and place; that
8 the testimony given by said witness was stenographically
9 recorded in the presence of said witness and afterwards
10 transcribed by computer under my personal supervision,
11 and that the said deposition is a full, true and correct
12 transcript of the testimony given by the witness.

13 I further certify that I am not connected by
14 blood or marriage with any of the parties or their
15 attorneys, and that I am not an employee of either of
16 them, nor financially interested in the action.

17 IN WITNESS WHEREOF, I have hereunto
18 subscribed my name this 11th day of December, 2018.

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21

22 Susan Capobianco CSR-2282

Oakland County, Michigan

23 My Commission expires: 3-24-23
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